

### **REMARKS**

The present Amendment amends claims 1-11. Therefore, the present application has pending claims 1-11.

Applicants note that the Examiner did not consider the Information Disclosure Statement submitted on January 26, 2001 along with the present application. A copy of the January 26, 2001 Information Disclosure Statement is attached for consideration by the Examiner. An indication that such Information Disclosure Statement has been considered is respectfully requested.

Claims 1-5 stand rejected under 35 USC §103(a) as being unpatentable over Rose (U.S. Patent No. 6,085,199) in view of Knight (U.S. Patent No. 6,314,460); and claims 6-11 stand rejected under 35 USC §103(a) as being unpatentable over Knight in view of Rose. These rejections are traversed for the following reasons. Applicants submit that the features of the present invention as recited in claims 1-11 are not taught or suggested by Knight or Rose whether taken individually or in combination with each other as suggested by the Examiner. Therefore, Applicants respectfully request the Examiner to reconsider and withdraw these rejections.

Amendments were made to the claims in order to more clearly describe features of the present invention. Particularly, amendments were made to the claims to more clearly recite that the present invention is directed to a system having a host and a plurality of storages connected to a data transfer network wherein the system includes a converter facility for converting a unit of data specific to an operating system (OS) on the host into a unit of data common to the plurality of storages and a management facility for managing a read out of a unit of data common to the

storages which responds to a unit name of data received from the host from one of the storages upon reception of the unit name of the data from the host. According to the present invention each of the storages includes a storage device storing data and a controller for allocating a data which is transferred through the data transfer network to a virtual space and storing the data allocated to the virtual space in the storage device.

The above described features of the present invention is intended to operate in an environment where files in various formats for different operating systems coexist and where a number of data storage devices are connected to each other through a fast data transfer network. The present invention manages data in the form of data units common to each of the storage devices thus allowing for the free transfer of data among the storage devices regardless of the different file formats of the hosts. Attention is directed to page 6, lines 15-18 of the present application.

The above described features of the present invention as now more clearly recited in the claims are not taught or suggested by any of the references of record whether taken individually or in combination with each other. Particularly, the above described features of the present invention now more clearly recited in the claims are not taught or suggested by Rose or Knight whether taken individually or in combination with each other as suggested by the Examiner.

Rose describes a method and apparatus in a network file system which is operable to report multiple virtual files in various formats for a single native file in storage. Thus, Rose provides an operating system that converts files but does not

allow for the free transfer of data among a plurality of storages across a network as in the present invention.

Knight teaches a method and apparatus for analyzing a storage network based upon incomplete information. However, Knight similar to Rose fails to teach or suggest a method and apparatus which allows for the free transfer of data regardless of the difference of operating systems used in the storage devices and host as in the present invention.

Therefore, combining the teachings of Rose and Knight still fails to teach or suggest the features of the present invention wherein a method and apparatus is provided for allowing the free transfer of data among a plurality of storage devices regardless of the difference in operating systems or difference of file formats of the host.

Therefore, both Rose and Knight fail to teach or suggest a converter facility for converting a unit of data specific to an operating system on the host into a unit of data common to the storages as recited in the claims.

Further, both Rose and Knight fail to teach or suggest a management facility for managing a readout of a unit of data common to the plurality of storages which responds to a unit name of data received from the host from one of the storages upon reception of the unit name of the data from the host as recited in the claims.

Still further, both Rose and Knight fail to teach or suggest that each of the storages includes a storage device for storing data and a controller for allocating data which is transferred through the data transfer network to a virtual space and

storing the data allocated to the virtual space in the storage device as recited in the claims.

Since both Rose and Knight are deficient of the same features of the present invention as now more clearly recited in the claims, the combination of Rose and Knight would not render obvious the features of the present invention as recited in the claims under 35 USC §103(a). Accordingly, reconsideration and withdrawal of the 35 USC §103 rejections of the claims based on the combination of Rose and Knight is respectfully requested.


The remaining references of record have been studied. Applicants submit that they do not supply any of the deficiencies noted above with respect to the references utilized in the rejection of claims 1-11.

In view of the foregoing amendments and remarks, Applicants submit that claims 1-11 are in condition for allowance. Accordingly, early allowance of claims 1-11 is respectfully requested.

To the extent necessary, the applicants petition for an extension of time under 37 CFR 1.136. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, or credit any overpayment of fees, to the deposit account of Antonelli, Terry, Stout & Kraus, LLP, Deposit Account No. 01-2135 (520.39555X00).

Respectfully submitted,

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